

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

STEVE SANDS,

Plaintiff,

-against-

CBS INTERACTIVE INC.,

Defendant.

Case No. 18-cv-07345 (JSR)

ECF Case

SUPPLEMENTAL DECLARATION OF ELEANOR M. LACKMAN

ELEANOR M. LACKMAN declares as follows:

1. I am a member of the Bar of this Court and a partner in the law firm of Cowan, DeBaets, Abrahams & Sheppard LLP, attorneys for defendant CBS Interactive Inc. (“CBSi”) in this proceeding. I submit this supplemental declaration in further support of CBSi’s opposition to plaintiff Steve Sands’ (“Plaintiff”) motion, pursuant to Federal Rule of Civil Procedure 56, for summary judgment against CBSi.

2. On March 1, 2019, my firm took the deposition of Plaintiff. Attached hereto as **Exhibit A** is a true and correct copy of relevant excerpts of the transcript of that deposition.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: New York, New York
March 5, 2019



ELEANOR M. LACKMAN